

RQ-2

April 26, 2012

MR. RANDALL BROZ, TREASURER EDPAC 499 SOUTH CAPITOL ST. SW, SUITE 422 WASHINGTON, DC 20003

Response Due Date 05/31/2012

**IDENTIFICATION NUMBER: C00467837** 

REFERENCE: YEAR-END REPORT (07/01/2011 - 12/31/2011)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 1 item(s):

- Your report discloses a reimbursement(s) for "Reimbursement - Food and Beverage Expense, "Reimbursement - Travel Expense," "Reimbursement - Office Supplies," and "Reimbursement - Postage" to "Political Development Group, LLC," an apparent corporation. This appears to be an in-kind contribution made on behalf of your committee, as the original payment for the goods and services has been made by an entity other than your committee. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, salaries, telephone service, office equipment and supplies.

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), unaffiliated political committee, or any other entity would be considered an in-kind contribution from that person, committee or entity, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 C.F.R. §104.3, and the limitations and prohibitions of 2 U.S.C. §8441a and 441b. Please be advised that 2 U.S.C. §441b(a) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation. Limited liability companies (LLC's) that choose to be treated as corporations under the Internal Revenue Service rules, or have shares that are traded publicly, are considered corporations.